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U.S. DISTRICT COURT E.D.N.Y.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

★ JUL 24 2008 ★

BROOKLYN OFFICE

André Soleil, Rebecca K. Roy and Donauld Soleil as
representative of the class of 951 signatory
Democratic Party members/voters petitioning and
designating André Soleil and Rebecca K. Roy as
candidates to public office and party positions in the
50th Assembly District of the State of New York,
Plaintiff(s),

08 3015

-v-

CASE NUMBER: CV-08-

Board of Election in the City of New York, Democratic
Party of the State of New York, Kings County
Democratic County Committee, Joseph R. Lentol,
Steve D. Cohn, Linda Minucci, Guido Cianciotta,
Theresa A. Cianciotta and Amy Z. Cleary,
Defendants.

TRAGER, J.

-COMPLAINT-

Come now ANDRÉ SOLEIL, REBECCA K. ROY and DONAULD SOLEIL as representative of
the class of 951 signatory Democratic Party members/voters petitioning and designating André
Soleil and Rebecca K. Roy as candidates to public office and party positions in the 50th
Assembly District of the State of New York, plaintiffs, complaining of the BOARD OF ELECTION
IN THE CITY OF NEW YORK, DEMOCRATIC PARTY OF THE STATE OF NEW YORK, KINGS COUNTY
DEMOCRATIC COUNTY COMMITTEE, JOSEPH R. LENTOL, STEVE D. COHN, LINDA MINUCCI, GUIDO
CIANCIOTTA, THERESA A. CIANCIOTTA and AMY Z. CLEARY, and would show as follows:

-PARTIES, JURISDICTION & VENUE-

1. Plaintiff, ANDRÉ SOLEIL, is a duly qualified voter of the State of New York, registered as
a member of the Democratic Party, who resides at, and entitled to vote in the Democratic
Party Primary Election of September 9, 2008 from 241 Taaffe Place, Borough of
Brooklyn, Kings County of the City and State of New York, a residence within the 50th

Assembly District of New York State; and is also a candidate for the public office of Member of the New York State Assembly from the 50th Assembly District and the party position of Male State Committee Member of the Democratic Party of the State of New York, so designated by filed petition of 951 voters from the Democratic Party for the aforesaid Primary Election, to be held in and for the 50th Assembly District of New York State, situated in the Borough of Brooklyn and County of Kings of the City and State of New York. During all times mentioned in this complaint, plaintiff was, and is, a citizen of the United States of America and New York State, and he resided, and still resides, in the Borough of Brooklyn and County of Kings in the City and State of New York.

2. Plaintiff, REBECCA K. ROY, is a duly qualified voter of the State of New York, registered as a member of the Democratic Party, who resides at, and entitled to vote in the Democratic Party Primary Election of September 9, 2008 from 163 Taaffe Place, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 50th Assembly District of New York State; and is also a candidate for the party position of Female State Committee Member of the Democratic Party of the State of New York, so designated by filed petition of 951 voters from the Democratic Party for the aforesaid Primary Election, to be held in and for the 50th Assembly District of New York State, situated in the Borough of Brooklyn and County of Kings of the City and State of New York. During all times mentioned in this complaint, plaintiff was, and is, a citizen of the United States of America and New York State, and he resided, and still resides, in the Borough of Brooklyn and County of Kings in the City and State of New York.

3. Plaintiffs, ANDRÉ SOLEIL and REBECCA K. ROY's, fundamental liberty interests, pursuant to the FIRST and FOURTEENTH AMENDMENTS, the CONSTITUTION OF THE STATE OF NEW YORK, and NY ELECTION LAW, in political expression through ballot access, are imperiled with erroneous deprivation by the Defendants, BOARD OF ELECTIONS IN THE CITY OF NEW YORK, pursuant to the meritless proceedings instituted thereat by, Defendants GUIDO CIANCOTTA, THERESA A. CIANCOTTA and AMY Z. CLEARY.
4. Plaintiffs, ANDRÉ SOLEIL and REBECCA K. ROY, have a fundamental liberty interest in not being burdened by frivolous actions, particularly those brought by persons lacking standing.
5. Plaintiffs, ANDRÉ SOLEIL and REBECCA K. ROY, are aggrieved candidates given standing pursuant to N.Y. ELEC. LAW § 16-102.
6. Plaintiff, DONALD SOLEIL, as representative of the class of 951 Democratic Party members/voters petitioning and designating André Soleil and Rebecca K. Roy as candidates to public office and party positions in the 50th Assembly District of the State of New York, is and are, as a class, duly qualified voter of the State of New York, registered as a members of the Democratic Party, all of whom reside in, and are entitled to vote in the Democratic Party Primary Election of September 9, 2008 from addresses within the 50th Assembly District of New York, Borough of Brooklyn and County of Kings. On knowledge and belief, during all times mentioned in this complaint, plaintiffs were, and are, citizens of the United States of America and New York State, who resided, and still reside, in the Borough of Brooklyn and County of Kings in the City and State of New York.

7. Plaintiffs' fundamental liberty interest, pursuant to the FIRST and FOURTEENTH AMENDMENTS, in political expression and association through the nomination or designation of political candidates are imperiled with erroneous deprivation by the Defendants, BOARD OF ELECTIONS IN THE CITY OF NEW YORK, pursuant to the meritless proceedings instituted thereat by, Defendants GUIDO CIANCIOTTA, THERESA A. CIANCIOTTA and AMY Z. CLEARY.
8. Plaintiffs' fundamental liberty interest, pursuant to the FIRST and FOURTEENTH AMENDMENTS, the CONSTITUTION OF THE STATE OF NEW YORK, and NY ELECTION LAW, in political representation before the duly constituted and empowered DEMOCRATIC PARTY OF THE STATE OF NEW YORK and KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE, are currently deprived by the candidacy for and incumbency in office of Defendant, STEVE D. COHN, who does not reside in the 50th Assembly District, yet is currently the representative New York Democratic Male State Committee Member from the 50th Assembly District.
9. This is an action at law to redress the deprivation under color of statute, ordinance, regulation, custom or usage, of rights, privileges, and immunities secured by the plaintiff by the Constitution of the United States and by federal law, particularly the CIVIL RIGHTS ACT, 42 U.S.C. § 1983.
10. This action arises under said 42 U.S.C. § 1983; under the FIRST AND FOURTEENTH AMENDMENTS to the CONSTITUTION OF THE UNITED STATES; under other provisions of federal law; and under 28 U.S.C. § 1367, the SUPPLEMENTAL JURISDICTION STATUTE, and N.Y. ELEC. LAW § 16-102. This Court has jurisdiction under and by the virtue of the

GENERAL FEDERAL QUESTION STATUTE, 28 U.S.C. § 1331, and the CIVIL RIGHTS JURISDICTION STATUTE, 28 U.S.C. § 1331.

11. Defendant, BOARD OF ELECTIONS IN THE CITY OF NEW YORK, with its primary office located at 32 Broadway, Borough of Manhattan and County, City and State of New York, as and is an administrative organ of the State of New York, charged and delegated authority, under the New York State's Election Law, with the responsibility of the supervision, execution, rulemaking, and adjudication of controversy, of official state and federal elections held in and for the City of New York, including the duties of receiving and filing designating petitions for public office and party positions in political subdivisions located entirely in the City of New York, the review and determination of objections and specifications to such designating petitions, notification of determinations of noncompliance, maintenance of the permanent personal voter registration roll and poll records, and official maps for all election districts located in the City of New York; and also the preparation of the official primary and general election ballots used in the City of New York.
12. Defendant, DEMOCRATIC PARTY OF THE STATE OF NEW YORK, was and is a duly recognized party organization of the State of New York, pursuant and subject to NY ELEC. LAW art. 2 (2008); and fully vested with the statutory authority of a political party in the State of New York.
13. Defendant, KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE, was and is a duly recognized party organization of the State of New York, pursuant and subject to NY ELEC. LAW art. 2 (2008); and fully vested with the statutory authority of a county committee of a political party in the State of New York.

14. On information and belief, defendant, JOSEPH R. LENTOL, is a duly qualified voter of the State of New York, registered as a member of the Democratic Party, who resides at, and entitled to vote in the Democratic Party Primary Election of September 9, 2008 from 152 Russell Street, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 50th Assembly District of New York State; and is the incumbent candidate for the public office of Member of the New York State Assembly from the 50th Assembly District, so designated by filed petition of more than 2,300 voters from the Democratic Party for the aforesaid Primary Election from said Assembly District, to be held in and for the 50th Assembly District of New York State, situated in the Borough of Brooklyn and County of Kings of the City and State of New York.
15. On information and belief, defendant, STEVE D. COHN, is a duly qualified voter of the State of New York, registered as a member of the Democratic Party, who resides at, and entitled to vote in the Democratic Party Primary Election of September 9, 2008 from 235 Adams Street, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 52nd Assembly District of New York State; and is the incumbent candidate for the party position of Male State Committee Member of the Defendant DEMOCRATIC PARTY OF THE STATE OF NEW YORK *allegedly* from the 50th Assembly District, so designated by filed petition of more than 2,300 voters from the Democratic Party for the aforesaid Primary Election from said Assembly District, to be held in and for the 50th Assembly District of New York State, situated in the Borough of Brooklyn and County of Kings of the City and State of New York.
16. On information and belief, defendant, LINDA MINUCCI, is a duly qualified voter of the State of New York, registered as a member of the Democratic Party, who resides at, and

entitled to vote in the Democratic Party Primary Election of September 9, 2008 from 218A North Henry Street, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 50th Assembly District of New York State; and is the incumbent candidate for the party position of Female Male State Committee Member of the Defendant DEMOCRATIC PARTY OF THE STATE OF NEW YORK *allegedly* from the 50th Assembly District, so designated by filed petition of more than 2,300 voters from the Democratic Party for the aforesaid Primary Election from said Assembly District, to be held in and for the 50th Assembly District of New York State, situated in the Borough of Brooklyn and County of Kings of the City and State of New York.

17. On information and belief, defendants, GUIDO CIANCIOTTA and THERESA A. CIANCIOTTA, were and are duly qualified voters of the State of New York, registered as a member of the Democratic Party, who reside at, and entitled to vote in the Democratic Party Primary Election of September 8, 2008 from, 231 Withers Street, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 50th Assembly District of New York State.
18. On knowledge and belief, defendant, AMY Z. CLEARY, was and is a duly qualified voter of the State of New York, registered as a member of the Democratic Party, who resides at, and entitled to vote in the Democratic Party Primary Election of September 9, 2008 from, 605 Morgan Avenue, Borough of Brooklyn, Kings County of the City and State of New York, a residence within the 50th Assembly District of New York State.
19. All defendants reside, and the claim arose, in the Eastern District of New York.

-CLAIM PURSUANT TO 42 U.S.C. § 1983-

20. On or about June 8, 2008, plaintiff, ANDRÉ SOLEIL (hereinafter “SOLEIL”), committed, at the request of a large gathering of supporters, to seek the office of State Assembly from the 50th Assembly District of the State of New York.
21. In the month of June 2008, the signatures of at least 951 registered voters and members of the Democratic Party of the State of New York were duly witnessed and gathered to form a petition designating of the SOLEIL, as a candidate for nomination by the Democratic Party at the party primary to be held September 14, 2004, for the public office of Member of the New York State Assembly from the 50th Assembly District of the State of New York, in accordance with the NY ELEC. LAW §§ 6-130 – 6-136 (2008). Said petition also nominated Yitchok Cohen to the party position of New York Democratic Party Male State Committee Member from the 50th Assembly District and Andrea Jones to the party position of New York Democratic Party Female State Committee Member from the 50th Assembly District.
22. On July 8, 2008, said designating/nominating petition was filed in the office of Defendant BOARD OF ELECTIONS IN THE CITY OF NEW YORK (hereinafter the “BOARD”), receiving Petition Identification Number KG0812128 (hereinafter “PETITION KG0812128”).
23. Yitchok Cohen declined said nomination by filing a Certificate of Declination with BOARD pursuant to NY ELEC. LAW § 6-146 (2008). The Committee to Fill Vacancies filled the vacancy caused by Yitchok Cohen’s declination, substituted SOLEIL as candidate for the party position of New York State Democratic Party Male State Committee Member from the 50th Assembly District, and SOLEIL accepted this

substitution pursuant to NY ELEC. LAW § 6-148 (2008). The said Certificates of Declination and Substitution were filed on or about July 8, 2008.

24. Andrea Jones declined said nomination by filing a Certificate of Declination with BOARD pursuant to NY ELEC. LAW § 6-146 (2008). The Committee to Fill Vacancies filled the vacancy caused by Andrea Jones' declination, substituted Plaintiff, REBECCA K. ROY (hereinafter "ROY") as candidate for the party position of New York State Democratic Party Female State Committee Member from the 50th Assembly District, and ROY accepted this substitution pursuant to NY ELEC. LAW § 6-148 (2008). The said Certificates of Declination and Substitution were filed on or about July 11, 2008.
25. Said designating/nominating petition was and is in due and proper form as prescribed by law, and contains more than the minimum number of signatures of duly enrolled voters of the Democratic Party in the 50th Assembly District, Borough of Brooklyn, County of Kings, City and State of New York, for which the said designation/nomination was made, and the said petition is otherwise valid, proper, sufficient and legally effective.
26. Both SOLEIL and ROY are qualified under the CONSTITUTION OF THE STATE OF NEW YORK and the NY ELEC. LAW to hold the public offices and/or party positions for which they are designated and/or nominated as candidates.
27. Due to the declinations of Yitchok Cohen and Andrea Jones, said persons have no further interest in the herein matters, other than that of any duly registered voter and member of the Democratic Party of the State of New York. All interest as candidates formerly held by the declining Yitchok Cohen and Andrea Jones has vested, pursuant to NY ELEC. LAW § 6-148 (2008), in SOLEIL and ROY respectively.

28. Defendants, AMY Z. CLEARY, GUIDO CIANCIOTTA and THERESA CIANCIOTTA (hereinafter and collectively the "OBJECTORS"), filed in the office of the BOARD a written General Objections on July 11, 2008 and written Specifications of Objections on July 17, 2008 pursuant to NY ELEC. LAW § 6-154 (2008).
29. OBJECTORS' general and specific objections pertained only to SOLEIL's substitution-nomination to the party position of New York Democratic Party Male State Committee Member from the 50th Assembly District.
30. OBJECTORS filed neither general objections nor specific objections against ROY for the party position of New York Democratic Party Female State Committee Member from the 50th Assembly District.
31. OBJECTORS filed neither general objections nor specific objections against SOLEIL for the public office of New York State Assembly Member from the 50th Assembly District.
32. On or about July 9, 2004, Defendants KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE, JOSEPH R. LENTOL (hereinafter "LENTOL"), STEVE D. COHN (hereinafter "COHN"), LINDA MINUCCI (hereinafter "MINUCCI"), filed, or caused to be filed, in the office of BOARD, another designating/nominating petition, receiving Petition Identification Numbers KG0800387-390 (hereinafter "PETITION KG0800387-390"), which designated LENTOL as candidate for the Democratic nomination to the public office of New York State Assembly Member from the 50th Assembly District, and nominated COHN and MINUCCI to the party positions of New York Democratic Party Male and Female State Committee Members respectively from the 50th Assembly District.
33. COHN currently resides, and has resided at, 235 Adams Street, Apt. 6H, Brooklyn, NY (11201); this is COHN's address on PETITION KG0800387-390, this is COHN's

address on his Voter Registration Card, and this is the address from which COHN has voted for nearly a decade; this address is in the 52nd Assembly District, NOT the 50th Assembly District.

34. COHN, who resides in the 52nd Assembly District, is not nominated *from* the 50th Assembly District as required by law.
35. COHN, who resides in the 52nd Assembly District, yet is the incumbent New York Democratic Party Male State Committee Member, is neither qualified under law to hold such office, nor presently qualified to represent the voters and registered Democratic Party Members of the 50th Assembly District with either Defendants, DEMOCRATIC PARTY OF THE STATE OF NEW YORK, or KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE.
36. In fact, COHN is not a qualified voter or party member eligible to nominate, sign any petition, object to any petition, or vote for any office exclusive to the 50th Assembly District. However, COHN operates in all the vested powers of State Committee Member and Assembly District Leader contrary to statute and party rule.
37. PETITION KG0812128 was and is in due and proper form as prescribed by law, and contains more than 951 signatures (at least 451 more than the 500 statutory minimum) of duly enrolled voters of the Democratic Party in the 50th Assembly District, Borough of Brooklyn, County of Kings, City and State of New York, for which the said designation/nomination was made, and the said petition is otherwise valid, proper, sufficient and legally effective.
38. Upon information and belief, OBJECTORS Specifications of Objections are insufficient, and many of the items of the said Specifications of Objections are totally without merit in

law or in fact. Objectors purport to invalidate PETITION KG0812128 entirely based on their common allegations that the various signers and subscribing witnesses have incomplete addresses, are not registered, are not enrolled in the Democratic Party, and/or cannot be identified. Such objections are entirely frivolous and without merit.

39. PETITION KG0812128 may have omitted the common city and state names of “Brooklyn, NY” at the signers’ and witnesses’ address information. However, “Kings” is printed at each signers’ address information, and each signer and subscribing witness’ Voter Identification Number is printed on PETITION KG0812128 at each signer’s and each subscribing witnesses’ signatures.
40. Kings County and Brooklyn, New York are entirely the same.
41. This Voter Registration Identification Number is the unique identifier in BOARD’s voter records, through which, each voter’s registration, party enrollment and residence is referenced. The presence of the Voter Registration Identification Number irrefutably identifies each voter and subscribing witness by name, residence, and party enrollment without refutation as a member of the Democratic Party residing in the 50th Assembly District in the Borough of Brooklyn, County of Kings, City and State of New York.
42. Upon information and belief, the BOARD has not yet made a determination upon the said General Objection and Specifications of Objections.
43. The BOARD cannot possibly dispose and rule as to the above-mentioned objections before the statutory limitation date. The Statute of Limitations date for election matters pertinent to the September 9, 2008 primary election is July 24, 2008, yet July 29, 2008 is the date that the BOARD begins its hearings regarding General Objections and Specifications of Objections.

44. Upon information and belief, the said General Objection and Specifications of Objections will come on for a hearing before the BOARD on July 29, 2008, or shortly thereafter, and many of the items and Specifications of Objections will, of necessity, have to come before this Court for determination.
45. SOLEIL believes that it is possible that the BOARD may make erroneous determinations of the several questions of law and fact raised by OBJECTORS, which determinations would, according to law and the principles of equity, be relieved and determined by this Court and, in the event that the said BOARD shall make determinations sustaining all or any part of the said objections, SOLEIL will be aggrieved by such determination.
46. As such, the BOARD should be enjoined to place SOLEIL and ROY on the September 9, 2008, primary election ballot for the party positions of New York State Democratic Party Male and Female State Committee Members respectively from the 50th Assembly District, and SOLEIL on the ballot for the public office of New York State Assembly Member from the 50th Assembly District.
47. Petitioner has no adequate remedy other than provided for here.

-PRAYER-

WHEREFORE, Plaintiffs demand judgment:

- (a) Declaring insufficient, defective, invalid, null and void PETITION KG0800387-390 filed with the BOARD, to the extent that it purports to nominate COHN as candidate for the New York Democratic Party Male State Committee Member from the 50th Assembly District in the September 9, 2008 Democratic Party Primary Election;
- (b) Enjoining, restraining, and prohibiting the BOARD from printing and placing the names of COHN on the official ballots (including without limitation all absentee, affidavit,

military emergency or other paper ballots) to be used at the September 9, 2008

Democratic Party Primary Election for the party position of New York Democratic Party Male State Committee Member from the 50th Assembly District;

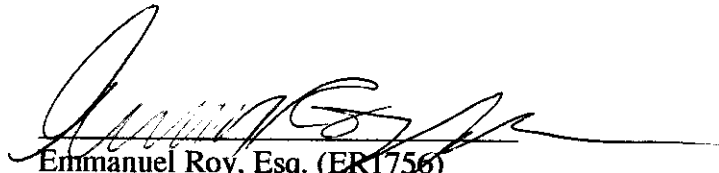
- (c) Enjoining, restraining and removing COHN from the party position of State Committee Member of the DEMOCRATIC PARTY OF THE STATE OF NEW YORK;
- (d) Enjoining, restraining and removing COHN from the party position of Executive Committee Member and Assembly District Leader from the 50th Assembly District of the KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE;
- (e) Declaring valid, proper, sufficient and legally effective PETITION KG0812128, and the subsequent and related Certificates of Declination and Substitution, heretofore filed in the BOARD, nominating SOLEIL and ROY as candidates for the party positions of New York Democratic Party Male and Female State Committee Members respectively from the 50th Assembly District, and designating SOLEIL as candidate for the Democratic Party nomination to the public office of New York State Assembly Member from the 50th Assembly District, in the September 9, 2008 Democratic Party Primary Election;
- (f) Enjoining, requiring and commanding the BOARD to place and print the names of SOLEIL and ROY as candidates for the party positions of New York Democratic Party Male and Female State Committee Members respectively from the 50th Assembly District, and designating SOLEIL as candidate for the Democratic Party nomination to the public office of New York State Assembly Member from the 50th Assembly District, in the September 9, 2008 Democratic Party Primary Election;
- (g) Enjoining and restraining the BOARD from printing, issuing or distributing for the use during said Primary Election any official ballots (including without limitation any

absentee, military affidavit, emergency or other paper ballot) upon which the names of SOLEIL and ROY as candidates for the party positions of New York Democratic Party Male and Female State Committee Members respectively from the 50th Assembly District, and SOLEIL as candidate for the Democratic Party nomination to the public office of New York State Assembly Member from the 50th Assembly District, do not appear; and

(h) For such other and further relief as may be equitable and just.

Respectfully Submitted,

Dated: Brooklyn, NY
July 23, 2008

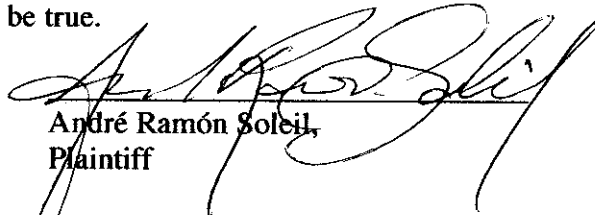

Emmanuel Roy, Esq. (ER1756)
Attorney for the Plaintiffs
Roy and Associates
26 Court Street, Rm. 1503
Brooklyn, NY 11242

-VERIFICATIONS-

STATE OF NEW YORK }
COUNTY OF KINGS } s.s.:

André Ramón Soleil, being duly sworn, deposes and says: I am the plaintiff in the within proceeding; I have read the foregoing complaint and know the contents thereof; that the same is true to my personal knowledge, except as to those matters alleged on information and belief, and that as to those matters, I believe them to be true.

Sworn to before me this
23 day of July, 2008.


André Ramón Soleil,
Plaintiff

CHUCK NOELL
Notary Public, State of New York
No. 01NO6137981
Qualified in Kings County
Commission Expires 12/05/2009

Notary

STATE OF NEW YORK }
COUNTY OF KINGS } S.S.:

Rebecca K. Roy, being duly sworn, deposes and says: I am the plaintiff in the within proceeding; I have read the foregoing complaint and know the contents thereof; that the same is true to my personal knowledge, except as to those matters alleged on information and belief, and that as to those matters, I believe them to be true.

Sworn to before me this
23 day of July, 2008.

Notary



Rebecca K. Roy,
Plaintiff

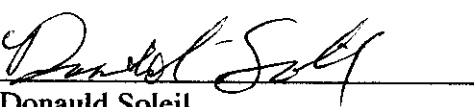
CHUCK NOELL
Notary Public, State of New York
No. 01NO6137981
Qualified in Kings County
Commission Expires 12/05/2009

STATE OF NEW YORK }
COUNTY OF KINGS } S.S.:

Donauld Soleil, being duly sworn, deposes and says: I am the plaintiff in the within proceeding; I have read the foregoing complaint and know the contents thereof; that the same is true to my personal knowledge, except as to those matters alleged on information and belief, and that as to those matters, I believe them to be true.

Sworn to before me this
23 day of July, 2008.

Notary



Donauld Soleil,
Plaintiff

CHUCK NOELL
Notary Public, State of New York
No. 01NO6137981
Qualified in Kings County
Commission Expires 12/05/2009

CASE NUMBER: CV-08- _____

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

André Soleil, Rebecca K. Roy and Donauld Soleil as
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Democratic Party members/voters petitioning and
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-v-

Board of Election in the City of New York, Democratic
Party of the State of New York, Kings County Democratic
County Committee, Joseph R. Lentol, Steve D. Cohn, Linda
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-SUMMONS & COMPLAINT-

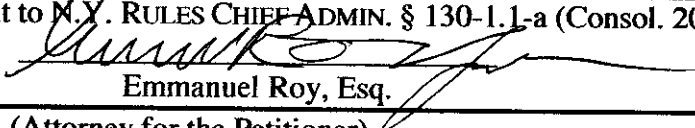
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Board of Election in the City of New York, Democratic
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Z. Cleary,
Defendants.

-SUMMONS & COMPLAINT-

Signature pursuant to N.Y. RULES CHIEF ADMIN. § 130-1.1-a (Consol. 2005)


Emmanuel Roy, Esq.

From: Emmanuel Roy, Esq. (Attorney for the Petitioner)
Office and Post Office Address, Telephone
26 Court Street, Suite 1503, Brooklyn, NY 11242
(718)797-2553 ph (718)797-3994 fx

To: Board of Elections in the City of New York	32 Broadway, New York, NY 10004
Democratic Party of the State of New York	461 Park Ave. South, New York, NY 10016
Kings County Democratic County Committee	16 Court Str., Brooklyn, NY 11201
Borchert, Genovesi, LaSpina & Landicino, P.C.	19-02 Whitestone Exp, Whitestone, NY 11357
<i>attorneys for Defendants Lentol, Cohn, Minucci, Cleary, Cianciotta and Cianciatto</i>	